

EXHIBIT B

From: [John T. Philipsborn](#) [REDACTED] [San Francisco, CA 94102](#)
To: [Dautch, Leif \(USACAN\)](#)
Subject: Re: [EXTERNAL] Soto...
Date: Monday, November 18, 2024 11:39:23 AM

Leif,

Just saw this--am once again out of town on a case. Just for the sake of consistency, I will file an objection to the procedure that YGR followed and to the stipulation. I owe to the client.

I appreciate the information,

John

John Philipsborn

[REDACTED]

San Francisco CA 94102

[REDACTED]

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On Monday, November 18, 2024 at 08:49:56 AM PST, Dautch, Leif (USACAN) [REDACTED] > wrote:

John,

I raised your concerns with Judge Gonzalez Rogers (particularly the defense-created exhibits like the declarations), and she continues to take the safety concerns very seriously. She was satisfied that an **AEO** disclosure of the sealed filings and attachments balanced the defense's need to prepare post-trial motions with your client's desire to keep that information out of the trial defendants' hands.

So we prepared a stipulation (draft attached) authorizing an AEO disclosure of the sealed filings. I'm awaiting approval from all counsel, and then plan to file and produce the sealed filings. They would need to seek leave of court to file anything that references the sealed materials, so I will let you know if that issue presents.

Thanks,

Leif

Leif M. Dautch

Assistant United States Attorney

Organized Crime Strike Force

[REDACTED]

[REDACTED]

From: John T. Philipsborn [REDACTED], San Francisco, CA 94102

Sent: Saturday, November 16, 2024 2:12 PM

To: Dautch, Leif (USACAN) <[REDACTED]>

Subject: [EXTERNAL] Soto...

Leif,

What was the outcome of the Thursday hearing ? Was the issue resolved, or is it an on-going saga ?

Any news much appreciated.

For what it may be worth, I am back out of town on and off this coming week, but will hopefully be able to return for a while in late November, early December. That last piece was added in case I may have to be included in some of the Cervantes et al festivities.

Have a good weekend,

John

John Philipsborn

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